UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b) HAYNES AND BOONE, LLP **BROWN RUDNICK LLP** Kenneth J. Aulet, Esq. (admitted pro hac vice) Richard S. Kanowitz, Esq. (NJ Bar No. 047911992) Seven Times Square Lauren M. Sisson, Esq. (NJ Bar No. 394182022) New York, New York 10036 30 Rockefeller Plaza, 26th Floor New York, New York 10112 (212) 209-4800 kaulet@brownrudnick.com (212) 659-7300 richard.kanowitz@haynesboone.com **BROWN RUDNICK LLP** lauren.sisson@haynesboone.com Tristan Axelrod, Esq. (admitted pro hac vice) One Financial Center Attorneys for the Plan Administrator Boston, MA 02111 (617)856-8300 taxelrod@brownrudnick.com General Counsel for the Plan Administrator GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 (973) 230-2095 DStolz@genovaburns.com DClarke@genovaburns.com Local Counsel for the Plan Administrator In re: Chapter 11 Case No. 22-19361 (MBK) BLOCKFI INC., et al., (Jointly Administered under a Confirmed Plan²) Hearing Date: November 7, 2024 @ 11:30 a.m. ET Debtors.¹ Response Deadline: October 31, 2024 @ 4:00 p.m. ET Oral Argument Waived Unless Response Timely Filed

NOTICE OF WIND-DOWN DEBTORS' MOTION FOR ENTRY OF AN ORDER TO SHOW CAUSE WHY GEORGE GERRO SHOULD NOT BE FOUND IN CONTEMPT AND FOR SANCTIONS AND IN THE ALTERNATIVE, MOTION TO ENFORCE THE CONFIRMATION ORDER

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¹ The Wind-Down Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Wind-Down Debtors' service address is c/o M3 Partners, 1700 Broadway, 19th Floor, New York, NY 10019.

² On October 3, 2023, the Court entered an order confirming the Third Amended Joint Chapter 11 Plan of BlockFi Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code (Additional Technical Modifications) (the "Plan") [Docket No. 1609].

PLEASE TAKE NOTICE that a hearing on the Wind-Down Debtors' Motion for Entry of an Order to Show Cause Why George Gerro Should Not Be Found in Contempt and for Sanctions and in the Alternative, Motion to Enforce the Confirmation Order (the "Motion") will be held on November 7, 2024, at 11:30 a.m. (ET), or as soon thereafter as counsel may be heard, before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge, in Courtroom #8 of the United States Bankruptcy Court for the District of New Jersey (the "Bankruptcy Court"), 402 East State Street, Trenton, New Jersey 08608.

PLEASE TAKE FURTHER NOTICE that the Motion and its attachments set forth the relevant factual bases upon which the relief requested should be granted. A proposed order granting the relief requested in the Motion is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be filed with the Clerk of the Court, together with proof of service thereof, and served and received by October 31, 2024, at 4:00 p.m. ET, upon the undersigned counsel for the Wind-Down Debtors.

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motion, if any, must be (a) in writing, (b) comply with the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the District of New Jersey, and (c) state with particularity the legal and factual basis for the objection. Unless responses are timely filed and served, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

Dated: October 8, 2024 /s/ Daniel M. Stolz

GENOVA BURNS LLC

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